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BY CM/ECF & HAND DELIVERY

The Honorable Christopher J. Burke
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street, Unit 28, Room 2325
Wilmington, DE 19801-3555

Re: *The Nielsen Company (US), LLC v. TVision Insights, Inc.*,
C.A. No. 22-1345-CJB

Dear Judge Burke:

In response to this Court's Order of March 22, 2024 (D.I. 104), TVision agrees to stay the entire case (including the antitrust claim).

In the interest of complete disclosure, TVision also wishes to call to the Court's attention to the fact that, as set forth in TVision's opening brief in support of its Motion to Consolidate (D.I. 92), "TVision expects to move to amend to assert the [anti-trust] counterclaim in the most recent action [between the parties], C.A. No. 23-1346-RGA." *Id.* at 7. As TVision explained in its brief, it had previously held off on filing that counterclaim in the 23-1346-RGA action pending the Court's resolution of the pending motion to dismiss the counterclaim in civil action number 22-1345-CJB. Now that the Court's decision on the motion to dismiss in the 22-1345-CJB action will be stayed, potentially until after the deadline to amend in the 23-1346-RGA action, TVision may file a stipulation or motion to add an anti-trust counterclaim to that case. Any such counter-claim would exclude the *Walker Process* portion of the counterclaim in the present case, C.A. No. 22-1345-CJB, which is based on the alleged intentional failure to disclose relevant prior art to the USPTO in connection with the prosecution of the patent at issue in this case.

Respectfully submitted,

/s/ Andrew E. Russell

Andrew E. Russell (No. 5382)

cc: Clerk of the Court (via CM/ECF & Hand Delivery)
All Counsel of Record (via CM/ECF and Email)